



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 18, 2018

Garlyn Navakuku, Facility Manager
P.O. Box 337
Keams Canyon, Arizona 86043

Dear Mr. Navakuku:

Enclosed is a copy of the sanitary survey report for the Hopi High School - BIA water system. Dan Fraser, of Sleeping Giant Environmental Consultants, conducted this survey on March 23, 2018, under contract with EPA. One of the requirements of the Safe Drinking Water Act (SDWA) is a periodic sanitary survey of the public water system to assess the ability of the system to provide safe and clean drinking water for the populations served. In general, a sanitary survey is required not less than once every 3-5 years.

During the sanitary survey conducted on the Hopi High School - BIA water system on March 23, 2018, the inspector found four deficiencies which are of significant health risk to the system and the people served by the system. These deficiencies have been deemed significant deficiencies and are of the greatest health threat. Under the SDWA's Ground Water Rule (GWR), significant deficiencies are defined to include, but are not limited to, defects in design, operation, or maintenance, or a failure or malfunction of the sources, treatment, storage or distribution system that EPA determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers. See 40 C.F.R. § 141.403(a)(4).

The significant deficiencies, summarized in the enclosure entitled "Required Corrections," must be corrected within a specified time frame, which is detailed below. The purpose of this letter is to initiate the consultation period during which you, the owner, must create a plan to correct these significant deficiencies. This plan must be approved by EPA before it can be implemented.

The specific actions you take to address the significant deficiencies must be approved by EPA in advance. Recommended solutions to the deficiencies have been provided, but if there are other options that you believe would correct the deficiencies, you may consult with EPA and seek approval.

In addition to these significant deficiencies, Section K of the report outlines other water system deficiencies as well as recommended improvements to ensure the delivery of safe water. Although EPA did not identify these as significant deficiencies, we highly recommend that you address all system deficiencies described in the report. Higher priority health risks represent higher potential for the introduction of contamination into the water delivered to customers and require attention as soon as possible.

Pursuant to 40 C.F.R. § 141.403(a)(4), you have 30 days from the date of this letter to consult with us to develop a plan to correct the significant deficiencies. The EPA-approved plan must be acted upon within 120 days from the date of this letter, or another EPA-approved timeframe. If we do not hear back from you by August 17, 2018, additional steps may be taken by EPA, which could include elevating this matter to the attention of EPA's Enforcement Office.

Please call Emmanuelle Rapicavoli at (415) 972-3969 or email at rapicavoli.emmanuelle@epa.gov to discuss your plans for remediating the above-described deficiencies. Thank you for your attention to these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'DAVID ALBRIGHT', with a stylized flourish at the end.

David Albright
Manager, Drinking Water Protection Section

Enclosures

cc: Timothy Nuvangyaoma, Chairman
Chuck Villa, Water Operator
Steven Berbeco, Superintendent
Lucille Sidney, Principal
John Graves, Environmental Scientist
Erwin Kaisem, Regional Facility Manager, OFMC
Lionel Puhuyesva, Director, WRP